

November 17, 2005

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Ex Parte Presentation**  
**CG Docket No. 04-208, WT Docket No. 05-194, CC Docket No. 98-170**

Dear Ms. Dortch:

On Wednesday, November 16, 2005, Mike Altschul, Senior Vice President and General Counsel, Christopher Guttman-McCabe, Vice President, Regulatory Affairs and Paul Garnett, Assistant Vice President, Regulatory Affairs, CTIA - The Wireless Association® met with Monica Desai, Jay Keithley, Leon Jackler, Gene Fullano, and Peter Tenhula, all of the Consumer and Governmental Affairs Bureau, regarding CTIA's petition asking the FCC to declare that states are precluded from regulating early termination fees under section 332(c)(3)(A) of the Communications Act of 1934, as amended. CTIA also urged the FCC to prevent states from regulating wireless carrier billing and point of sale procedures, except for consumer protection laws of general applicability. See CTIA Reply Comments in the Truth in Billing proceeding, CC Docket No. 98-170, CG Docket No. 04-208, at p. 43 (July 25, 2005). If the FCC chooses to adopt rules governing the content of wireless carrier bills, it should establish exclusively federal truth-in-billing regulations for wireless carriers consistent with the *CTIA Consumer Code for Wireless Service*. CTIA discussed the points detailed in the attached presentation.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter, along with all of the materials distributed at the meeting, is being filed via ECFS with your office. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/ s / *Christopher Guttman-McCabe*

Christopher Guttman-McCabe

Attachment

cc: Monica Desai  
Jay Keithley  
Leon Jackler  
Gene Fullano  
Peter Tenhula